

157. Defendants deny the allegations contained in paragraph 157 of the Complaint.

**Cartier's Tenth Claim for Relief  
Common Law Unfair Competition**

158. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 157 of this Answer as if fully set forth herein.

159. Defendants deny the allegations contained in paragraph 156 of the Complaint.

160. Defendants deny the allegations contained in paragraph 157 of the Complaint.

**Cartier's Eleventh Claim for Relief  
New York General Business Law §349**

161. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 160 of this Answer as if fully set forth herein.

162. Defendants deny the allegations contained in paragraph 162 of the Complaint.

163. Defendants deny the allegations contained in paragraph 163 of the Complaint.

164. Defendants deny the allegations contained in paragraph 164 of the Complaint.

165. Defendants deny the allegations contained in paragraph 165 of the Complaint.

**Cartier's Twelfth Claim for Relief  
New York General Business Law §360-1**

166. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 165 of this Answer as if fully set forth herein.

167. Defendants deny the allegations contained in paragraph 167 of the Complaint.

168. Defendants deny the allegations contained in paragraph 168 of the Complaint.

169. Defendants deny the allegations contained in paragraph 169 of the Complaint.

**Van Cleef's First Claim for Relief  
Trademark Infringement**

170. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55 and 92 through 101 of this Answer as if fully set forth herein.

171. Defendants deny the allegations contained in paragraph 171 of the Complaint.

172. Defendants deny the allegations contained in paragraph 172 of the Complaint.

173. Defendants deny the allegations contained in paragraph 173 of the Complaint.

174. Defendants deny the allegations contained in paragraph 174 of the Complaint.

175. Defendants deny the allegations contained in paragraph 175 of the Complaint.

176. Defendants deny the allegations contained in paragraph 176 of the Complaint.

**Van Cleef's Second Claim for Relief  
False Designation of Origin**

177. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 176 of this Answer as if fully set forth herein.

178. Defendants deny the allegations contained in paragraph 178 of the Complaint.

179. Defendants deny the allegations contained in paragraph 179 of the Complaint.

180. Defendants deny the allegations contained in paragraph 180 of the Complaint.

181. Defendants deny the allegations contained in paragraph 181 of the Complaint.

**Van Cleef's Third Claim for Relief  
False Designation of Origin**

182. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 181 of this Answer as if fully set forth herein.

183. Defendants deny the allegations contained in paragraph 183 of the Complaint.

184. Defendants deny the allegations contained in paragraph 184 of the Complaint.

185. Defendants deny the allegations contained in paragraph 185 of the Complaint.

186. Defendants deny the allegations contained in paragraph 186 of the Complaint.

187. Defendants deny the allegations contained in paragraph 187 of the Complaint.

188. Defendants deny the allegations contained in paragraph 188 of the Complaint.

**Van Cleef's Fourth Claim for Relief  
False Advertising**

189. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 188 of this Answer as if fully set forth herein.



190. Defendants deny the allegations contained in paragraph 190 of the Complaint.

191. Defendants deny the allegations contained in paragraph 191 of the Complaint.

192. Defendants deny the allegations contained in paragraph 192 of the Complaint.

193. Defendants deny the allegations contained in paragraph 193 of the Complaint.

**Van Cleef's Fifth Claim for Relief  
Trademark Dilution**

194. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 193 of this Answer as if fully set forth herein.

195. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 195 of the Complaint.

196. Defendants deny the allegations contained in paragraph 196 of the Complaint.

197. Defendants deny the allegations contained in paragraph 197 of the Complaint.

198. Defendants deny the allegations contained in paragraph 198 of the Complaint.

199. Defendants deny the allegations contained in paragraph 199 of the Complaint.

200. Defendants deny the allegations contained in paragraph 200 of the Complaint.

201. Defendants deny the allegations contained in paragraph 201 of the Complaint.

**Van Cleef's Sixth Claim for Relief  
Copyright Infringement**

202. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 201 of this Answer as if fully set forth herein.

203. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 203 of the Complaint.

204. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 204 of the Complaint that the French Copyrighted Designs were first offered for sale in France, but deny all other allegations contained in this paragraph.

205. Defendants deny the allegations contained in paragraph 205 of the Complaint.

206. Defendants deny the allegations contained in paragraph 206 of the Complaint.

207. Defendants deny the allegations contained in paragraph 207 of the Complaint.

208. Defendants deny the allegations contained in paragraph 208 of the Complaint.

209. Defendants deny the allegations contained in paragraph 209 of the Complaint.

**Van Cleef's Seventh Claim for Relief  
Trade Dress Infringement**

210. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 209 of this Answer as if fully set forth herein.

211. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 211 of the Complaint.

212. Defendants deny the allegations contained in paragraph 212 of the Complaint.

213. Defendants deny the allegations contained in paragraph 213 of the Complaint.

214. Defendants deny the allegations contained in paragraph 214 of the Complaint.

215. Defendants deny the allegations contained in paragraph 215 of the Complaint.

216. Defendants deny the allegations contained in paragraph 216 of the Complaint.

**Van Cleef's Eighth Claim for Relief  
Common Law Trademark Infringement**

217. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 216 of this Answer as if fully set forth herein.

218. Defendants deny the allegations contained in paragraph 218 of the Complaint.

219. Defendants deny the allegations contained in paragraph 219 of the Complaint.

**Van Cleef's Ninth Claim for Relief  
Common Law Unfair Competition**

220. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 219 of this Answer as if fully set forth herein.

221. Defendants deny the allegations contained in paragraph 221 of the Complaint.

222. Defendants deny the allegations contained in paragraph 222 of the Complaint.



**Van Cleef's Tenth Claim for Relief  
New York General Business Law §349**

223. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 222 of this Answer as if fully set forth herein.

224. Defendants deny the allegations contained in paragraph 224 of the Complaint.

225. Defendants deny the allegations contained in paragraph 225 of the Complaint.

226. Defendants deny the allegations contained in paragraph 226 of the Complaint.

227. Defendants deny the allegations contained in paragraph 227 of the Complaint.

**Van Cleef's Eleventh Claim for Relief  
New York General Business Law §360-1**

228. Defendants repeat and reallege each and every response contained in paragraphs 1 through 13, 35 through 55, 92 through 101 and 170 through 227 of this Answer as if fully set forth herein.

229. Defendants deny the allegations contained in paragraph 229 of the Complaint.

230. Defendants deny the allegations contained in paragraph 230 of the Complaint.